

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA <i>ex</i>)	
<i>rel.</i> KAMAL MUSTAFA AL-SULTAN,)	
)	
Plaintiff/Relator,)	
)	
v.)	CIVIL CASE NO.
)	1:05-CV-02968-TWT
THE PUBLIC WAREHOUSING)	
COMPANY, K.S.C., <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT TAREK ABDUL AZIZ SULTAN AL-ESSA’S MOTION TO
ADOPT CO-DEFENDANT THE PUBLIC WAREHOUSING COMPANY,
K.S.C.’S MOTION TO TRANSFER VENUE TO THE EASTERN DISTRICT
OF PENNSYLVANIA, PURSUANT TO 28 U.S.C. § 1404(a)**

Defendant Tarek Abdul Aziz Sultan Al-Essa (“Sultan”), by and through his counsel, hereby moves to adopt co-Defendant The Public Warehousing Company, K.S.C., a/k/a Agility’s (“PWC”) Motion to Transfer Venue to the Eastern District of Pennsylvania, Pursuant to 28 U.S.C. § 1404(a), and PWC’s brief and other materials in support thereof (Dkt. 164), filed on July 18, 2016.

Relator Kamal Mustafa Al-Sultan (“Relator”) filed the initial complaint in this action under seal on November 18, 2005, naming Mr. Sultan as well as PWC, The Sultan Center Food Products Company, K.S.C., and two other individuals as

defendants. (*See* Dkt. 1.) On November 13, 2009, the government officially intervened in this action (Dkt. 65), and subsequently filed its Complaint in Intervention and its First Amended Complaint in Intervention on January 5, 2011 and September 30, 2011, respectively. (*See* Dkts. 71, 78.) Neither of the government's complaints names Mr. Sultan as a defendant. Nonetheless, Mr. Sultan has standing to file this motion because he remains a defendant in this action as a result of Relator's claims against him, and, accordingly, the legal and factual arguments raised by co-Defendant PWC in support of transferring this case to the Eastern District of Pennsylvania apply with equal force to him.

For the foregoing reasons, Mr. Sultan respectfully requests that the Court allow him to join in PWC's Motion to Transfer Venue to the Eastern District of Pennsylvania, Pursuant to 28 U.S.C. § 1404(a), and PWC's brief and other materials in support thereof (Dkt. 164), and to adopt the same as his own.

Dated: August 22, 2016

Respectfully submitted,

s/ Richard Marmaro

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The Public Warehousing Company, K.S.C., and

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LOCAL RULE 5.1 CERTIFICATION

I hereby certify that this document has been prepared in Times New Roman 14-point font in accordance with Local Rule 5.1.

Dated: August 22, 2016

Respectfully submitted,

s/ Richard Marmaro

Richard Marmaro

Attorney for Defendants
The Public Warehousing Company, K.S.C., and
Tarek Abdul Aziz Sultan Al-Essa

CERTIFICATE OF SERVICE

I hereby certify that on this day I have caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filings to all counsel of record.

This 22nd day of August, 2016.

s/ Richard Marmaro

Richard Marmaro